

Attorneys for Defendant
FEDERAL EXPRESS CORPORATION,

)	Case No. C04-0098 SI
)	
EDWARD ALVARADO, JOHN AZZAM,)	DEFENDANT’S ADMINISTRATIVE
CHARLOTTE BOSWELL, TANDA BROWN,)	MOTION FOR LEAVE TO FILE
BERTHA DUENAS, PERNELL EVANS,)	UNDER SEAL (1) PARKER’S
CHARLES GIBBS, JANICE LEWIS, MARIA)	<i>SATCHELL</i> TIME RECORDS, (2)
MUNOZ, KEVIN NEELY, LORE PAOGOFIE,)	PARKER’S TELEPHONE RECORDS,
DYRONN THEODORE, LASONIA WALKER)	(3) PARKER’S PERSONAL
and CHRISTOPHER WILKERSON,)	COMPUTER RECORDS AND (4)
)	CERTAIN PORTIONS OF THE
Plaintiffs,)	PARTIES’ PLEADINGS THAT
)	REFERENCE THESE MATERIALS,
v.)	INCLUDING (A) DECLARATION OF
)	BARAK J. BABCOCK IN SUPPORT OF
FEDEX CORPORATION, a Delaware)	DEFENDANT’S MOTION TO COMPEL
corporation, dba FEDEX EXPRESS,)	DISCOVERY AND (B) DEFENDANT’S
)	REPLY MEMORANDUM IN SUPPORT
Defendant.)	OF ITS MOTION TO COMPEL
)	DISCOVERY

Defendant's Administrative Motion For Leave To File Under Seal (1) Parker's *Satchell* Time Records, (2) Parker's Telephone Records, (3) Parker's Personal Computer Records And (4) Certain Portions Of The Parties' Pleadings That Reference These Materials, Including (A) Declaration Of Barak J. Babcock In Support Of Defendant's Motion To Compel Discovery And (B) Defendant's Reply Memorandum In Support Of Its Motion To Compel Discovery, Case No. C04-0098 SJ

1 Defendant, Federal Express Corporation, hereby moves the Court pursuant to Civil L.R.
2 7-11 and 79.5(b) to file under seal (1) Parker's *Satchell* time records, (2) Parker's telephone
3 records, (3) Parker's personal computer records and (4) certain portions of the Parties' pleadings
4 that reference these materials, including (A) Declaration of Barak J. Babcock in Support of
5 Defendant's Motion to Compel Discovery and (B) Defendant's Reply Memorandum in Support
6 of Its Motion to Compel Discovery. FedEx submits the following in support of its Motion:
7

8 1. The Special Master issued an Order (Docket No. 1378) directing FedEx to file
9 Parker's *Satchell* time records under seal.

10 2. Additionally, in discovery, FedEx received Parker's telephone records and
11 personal computer records, which Parker believes should be filed under seal.
12

13 3. The *Satchell* time records and Parker's telephone records and personal computer
14 records are (or will be) discussed in future pleadings in this Court regarding Parker's fee
15 petitions.

16 4. FedEx requests that the Court permit it to file under seal exhibits to the
17 Declaration of Barak J. Babcock in Support of Defendant's Motion to Compel Discovery, which
18 contain Parker's *Satchell* time records, telephone records and computer records.

19 5. FedEx further requests that the Court permit it to file the portion of Defendant's
20 Reply Memorandum in Support of Its Motion to Compel Discovery, which directly quotes from
21 the *Satchell* time records under seal.
22

23 6. Finally, FedEx requests that the Court issue an Order permitting the Parties to file
24 portions of future pleadings, which directly quote Parker's *Satchell* time records, telephone
25 records and/or computer records, under seal with the Court.

26 7. Should the Court grant the requested relief, FedEx will file "publicly" its
27 pleadings and only redact the portions of the pleading that references Parker's *Satchell* time
28

1 records, telephone records and/or computer records. FedEx will then file under seal a copy of
2 the non-redacted pleading.

3 For these reasons, FedEx respectfully requests that the Court issue an Order permitting
4 FedEx to file under seal (1) Parker's *Satchell* time records, (2) Parker's telephone records, (3)
5 Parker's personal computer records and (4) certain portions of the Parties' future pleadings that
6 directly quote these materials.
7

8
9 DATED: April 15, 2009.

FEDERAL EXPRESS CORPORATION

10 By: /s/ Barak J. Babcock
11 Barak J. Babcock
12 Attorneys for Defendant
13 Federal Express Corporation
14

15 772650
16
17
18
19
20
21
22
23
24
25
26

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

EDWARD ALVARADO, JOHN AZZAM,
CHARLOTTE BOSWELL, TANDA BROWN,
BERTHA DUENAS, PERNELL EVANS,
CHARLES GIBBS, JANICE LEWIS, MARIA
MUNOZ, KEVIN NEELY, LORE PAOGOFIE,
DYRONN THEODORE, LASONIA WALKER
and CHRISTOPHER WILKERSON,

Plaintiffs,

v.

FEDEX CORPORATION, a Delaware
corporation, dba FEDEX EXPRESS,

Defendant.

Case No. C04-0098 SI

**[PROPOSED] ORDER PERMITTING
THE FILING OF PARKER'S
SATCHELL TIME RECORDS,
PARKER'S TELEPHONE RECORDS,
AND PARKER'S COMPUTER
RECORDS AND PORTIONS OF
PLEADINGS THAT DISCUSS SUCH
RECORDS UNDER SEAL**

Judge: Hon. Susan Illston

Having reviewed the relevant pleadings, the Court GRANTS Defendant's Administrative Motion to seal (1) Parker's *Satchell* time records, (2) Parker's telephone records, (3) Parker's personal computer records and (4) certain portions of the Parties' future pleadings that reference these materials, including (A) the Declaration of Barak J. Babcock in Support of Defendant's Motion to Compel Discovery; and, (B) Defendant's Reply Memorandum in Support of Its Motion to Compel Discovery.

IT IS HEREBY ORDERED that (1) Parker's *Satchell* time records, (2) Parker's telephone records, and (3) Parker's personal computer records should be filed under seal.

IT IS FURTHER ORDERED that if the Parties should directly quote any of these materials in future pleadings that those portions of such pleadings should also be filed under seal.



Honorable Susan Illston
U.S. District Court Judge